



Inspection Report

Tracking ID: PC2006-068

Permit #: 127
Source: Tucson Iron & Metal
Location: 4484 E. Tennessee St.
Date: June 17, 2020
Arrival Time: 10:30 am
Departure Time: 11:45 am
Inspector: M. Rogers & J. Sufi
Spoke With: Caitlin Goldsmith, Manager
Phone #:
Reason for Inspection: Surveillance

Pima County Department of Environmental Quality (PDEQ) inspectors conducted off-site surveillance observations of Tucson Iron & Metal (TI&M) in the public easement located near the intersection of E. Kentucky St. and S. Belvedere Ave. The public easement provided an off-site observation position for viewing TI&M's incinerator and baghouse. During previous inspections, PDEQ had observed sustained plumes of black smoke emitting from TI&M's Other Solid Waste Incinerator (OSWI).

PDEQ inspector Joanne Sufi and I arrived to the public easement, and observed brown smoke rising above the incinerator area of TI&M. Both of us photographed the visible emissions (attachment 1 photos 1 - 6). The plumes of brown smoke were intermittent, and lasting for intervals of approximately 10 seconds. Additionally, the individual plumes of smoke were not continuously sustained, and had EPA Method 9 Observation opacities of 40% or less. The inconsistent nature of the visible emissions was not conducive to an EPA Alternative Method 082 Observation. Also, the view of the loading portion of the OSWI was obstructed by a large vehicle. We observed TI&M had repaired a black corrugated tube leading out of the baghouse with reflective thermal tape since PDEQ's last inspection. After photographing the visible emissions, Ms. Sufi and I proceeded to TI&M's office located at 4484 E. Tennessee St.

We arrived to TI&M's front gate on Tennessee St., and alerted staff of our presence. TI&M's staff summoned the Manager, Ms. Caitlin Goldsmith. When Ms. Goldsmith arrived, I conducted Inspection Rights (attachment 2). I informed Ms. Goldsmith that Ms. Sufi and I observed visible emissions from the area that contains the feeding port of the OSWI. I asked Ms. Goldsmith at what time did TI&M start incinerating activity, and the length of the current incineration project taking place. She informed me TI&M started incinerating at 8:15 am. The current session started

on June 16, 2020, and was planned to continue through to June 18, 2020 for a total of 3 consecutive burn days.

I then asked Ms. Goldsmith about the presence of visible emissions from the OSWI unit. She informed me TI&M had conducted repairs to the OSWI. Maintenance work had been conducted on the blower fan. The venturi was in the process of being adjusted for proper flow in order for a proper draft to the secondary burner. Afterwards, Ms. Goldsmith escorted us to the area that houses the OSWI. Ms. Sufi and I observed the sorbent injection system in operation. We were granted access to view the control panel that contained the magnahelic gauge for the baghouse. The needle for the gauge displayed the differential pressure for the baghouse was at 3.2 cfm. That value was within the indicated limits of 3-6 cfm.

After the inspection of the OSWI, I informed Ms. Goldsmith that PDEQ will contact TI&M in the future regarding a compliance determination.

Attachments:

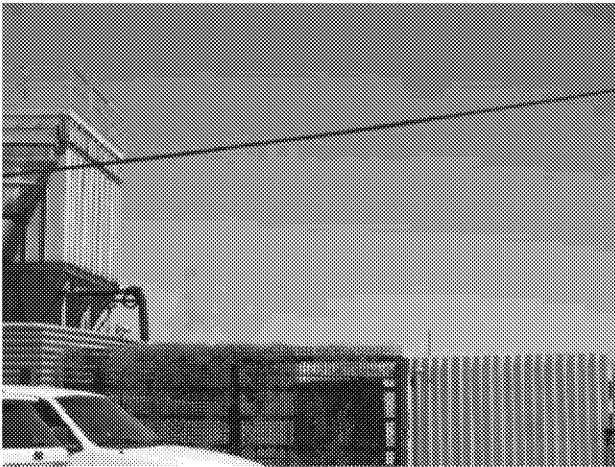
Photo Log dated June 17, 2020

Inspection Rights dated June 17, 2020

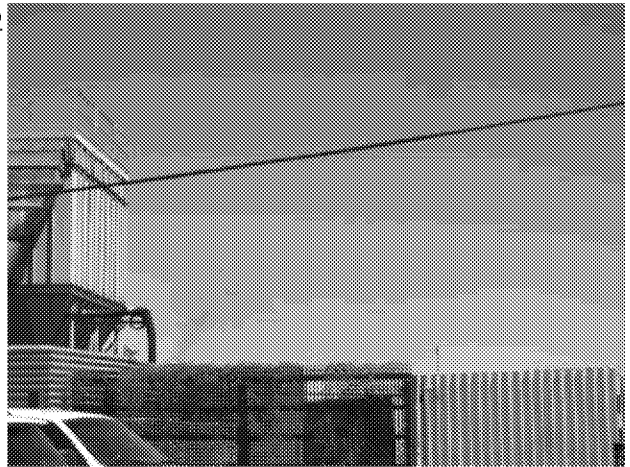
Site Location: E. Kentucky St. & S. Belvedere Ave.
Photographer: M. Rogers & J. Sufi

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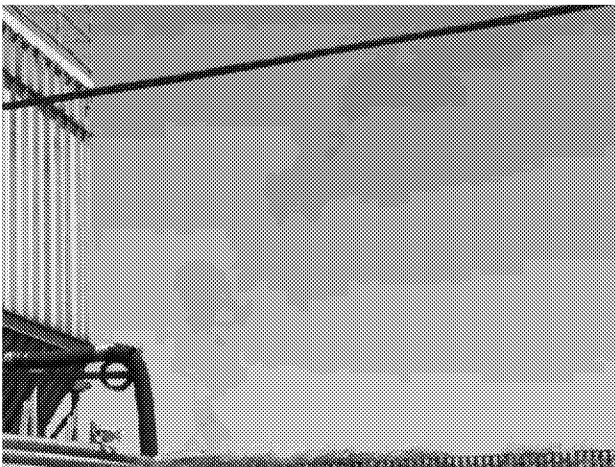
1



2



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PIMA COUNTY

ENVIRONMENTAL QUALITY

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

33 N. Stone Avenue, Suite 700, Tucson, AZ 85701-1429

Phone (520) 724-7400 FAX (520) 838-7432

http://webcms.pima.gov/government/environmental_quality/

AIR PROGRAM NOTIFICATION OF INSPECTION RIGHTS

SOURCE INFORMATION

PC # _____ Permit # 127
Regulated Person Tucson Iron + Metal
On-site Representative Carlton Goldsmith Title MSR
Site Location 4484 N. KENNESSEE ST Phone _____
Site Contact _____ E-Mail _____
Mailing Address _____

PDEQ INFORMATION

Inspector Name M. J. GARS Phone 724-7320
Inspection Date 6/17/2020 Time 11:21
Accompanied by JOANNE SUEI

Questions or comments on these procedures, your inspection and due process rights or this form may be directed to the Pima County Department of Environmental Quality (PDEQ) inspector listed on this form at (520) 724-7400. While I have the right to decline to sign this form, the PDEQ representative(s) may still proceed with the inspection under Pima County Code (PCC) 17.20.050.

☐ I acknowledge that I have read and understand the Inspection Rights on the back of this form.

Signature No Sig Due to Covid 19 Date 6/17/2020 ^{PROTOCOLS}

☐ _____ Refused to sign the Notification.

☐ Authorized on-site representative is not present at the facility.